

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANN MUNIZ, et al.,)	
)	
<i>Plaintiffs,</i>)	
v.)	
)	
REXNORD CORPORATION, et al.,)	
)	Case No. 04 C 2405
<i>Defendants.</i>)	
<hr style="width: 50%; margin-left: 0;"/>		
REXNORD CORPORATION , et al.,)	Judge J. Darrah
)	Magistrate Judge Levin
<i>Third-Party Plaintiff,</i>)	
v.)	
)	
ARROW GEAR COMPANY, et al.,)	
)	
<i>Third-Party Defendants.</i>)	
)	

**THIRD-PARTY DEFENDANT CHASE-BELMONT PROPERTIES'
ANSWERS TO THIRD-PARTY PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Now comes Third-Party Defendant, Chase-Belmont Properties ("CBP"), by its attorneys, and for its Answer to First Set of Interrogatories, states:

INTERROGATORIES

1. For each year that the facility in question has conducted operations, please identify the persons who have the most knowledge regarding:

- a. purchase,
- b. use,
- c. storage,
- d. disposal and/or release

of chlorinated solvents at the facility in question.

Answer: No person associated with CBP has first-hand knowledge regarding purchase, use, storage, disposal and/or release of chlorinated solvents at the facility in question.



The following is a list of tenants who have conducted operations at the facility in question:

I. Northwest Building (5000 to 5014 Chase Avenue, Downers Grove, IL)

5000

from 1972 to the present -- Tricon Manufacturing Company

The principal office for Tricon Industries, Inc. is located at 1600 Eisenhower Lane, Suite 200, Lisle, Illinois 60532. The last known phone number is (630) 964-2330.

5002

from 1972 to the present- Tricon Manufacturing Company

5004

from 1972 to the present- Tricon Manufacturing Company

5006

from 1972 to the present- Tricon Manufacturing Company

5008

from 1972 to the present- Tricon Manufacturing Company

5010

from 1972to 1973- Control Masters, Inc.;

from 1973 to the present- Tricon Manufacturing;

5012

from 1973 to 1974- Control Masters, Inc.;

from 1974 to 1979- Inter-Varsity Christian Fellowship of the USA, Inc.;

from 1979 to the present- Tricon Manufacturing

5014

from 1973- JCI;

from 1975- Enquip;

from 1979 to 1990- Tricon Manufacturing;

from 1990- Mid-States Engineers;

from 1996 to the present- Tricon Manufacturing

II. West Building (5016 to 5026 Chase Avenue, Downers Grove, IL)

5016

from 1973- Davidson-Uphoff, Inc.;
from 1974- MGD Graphic System;
from 1979- Rexnord;
from 1981- Firex Corp.;
from 1985- Advanced Products, Inc;
from 1987- GR Electronics;
from 1989- Corridor Supply Company;
from 1990- Aztech Engineering, Inc.;
from 1991- Quality Printing

5018

from 1973- Federal Sign & Signal Corp.;
from 1981- KVA, Inc.;
from 1987- Evcor;
from 1987- Lins Int. Co., Inc.;
from 1988- Aztech Eng., Inc.;
from 1992- DynaGear;
from 1994- Corridor Supply Company;
from 1998- Burnham Service Company;
from 2001- Double D Printing

5020

from 1973- Craig Ind.;
from 1975- Old Chicago Concessionaires, Inc.;
from 1976- Federal Sign & Signal Corp.;
from 1981- Firex;
from 1985- Aztech Engineering, Inc.;
from 1991- Corridor Supply, Inc.;
from 1995- Platinum Entertainment;
from 1998- Orland Sports, Ltd.;
from 2000- RMA Home Services, Inc.

5022

from 1973- Sullivan of Chicago, Inc.;
from 1976- Rexnord;
from 1981- Restoration Assoc., Inc.;
from 1984- 25K Corp.;
from 1990- Crescent Elec.;
from 1995- Patton Sales Company;
from 2002- RMA Home Services, Inc.

5024

from 1973- Rexnord;
from 1981- Sebright Induction Metal Treating, Inc.;
from 1984- Saf-T-Lok Corp.;
from 1990- Paramount Plastics, Inc.;
from 1993- Delta Industries;
from 1996- C & C Machine Tool Service, Inc.

5026

from 1973- Rexnord;
from 1981- Sebright Induction Metal Treating, Inc.;
from 1984- Technigraphics;
from 1985- Lumber Loft;
from 1987- Saf-T-Lok;
from 1990- Johnson C & E;
from 1992- Paramount Plastics, Inc.;
from 1993- Delta Industries, Inc.;
from 1996- T and J International;
from 1999- Bray Sales

III. Northeast Building (5001 to 5011 Chase Avenue, Downers Grove, IL)

5001

from 1974- Chemical Specialties Mfg. Corp.;
from 1977- Litton Financial Printing;
from 1981- Davia;

from 1982- JaBro Batteries, Inc.;
from 1989- American Computer & Comm.;
from 1990- Alkut Tool, Inc.;

5003

from 1973- Acme Pallets, Inc.;
from 1976- Pepperidge Farm, Inc.;
from 1978- Lovejoy;
from 1980- JaBro Batteries, Inc.;
from 1989- American Computer & Communications
from 1995- VSQ, Inc.;
from 1999- Rinker Set Up Service, Inc.;
from 2002- The Artisan Group

5005

from 1974- Acme Pallets, Inc.;
from 1975- Pine Hill Distributing Corp.;
from 1977- AGR Electronics, Inc.;
from 1987- JaBro Batteries, Inc.;
from 1991- Mr. Fix It, Inc.;
from 1994- Interior Applications;
from 1996- Pro-Tech;
from 2003- Digital Printing;

5007

from 1974- Control Masters, Inc.;
from 1975- Old Chicago Concessionaires;
from 1978- Reed-Rite Inc.;
from 1982- Advanced Products and Enterprises, Inc.;
from 1993- Dynagear;
from 1994- Interior Specialties Incorporated;
from 1996- Casco Manufacturing Company;
from 2003- Divisor Beverage Distributors;
from 2004- Schiappa Printing, Inc.

5009

from 1973- Norwood Marking & Equipment, Inc.;

from 1974- Pepperidge Farm;

from 1977- Modern Home Prod. Corp.;

from 1980- Reed-Rite, Inc.;

from 1983- Advanced Products and Enterprises, Inc.;

from 1993- Barry Thomas Plumbing;

from 1996- Burnham Service Company;

from 1998- NorthAir Inc.;

from 2000- Lees Wabschall and Associates;

from 2004- Independent Outdoor

5011

from 1973- Do-El Manufacturing Co.;

from 1974- B & B Manufacturing Co.;

from 1975- Ribco Machine Specialties;

from 1976 - Pepperidge Farms, Inc.;

from 1984 - Control Masters, Inc.;

from 1985- Advanced Products & Enterprises, Inc.;

from 1993- Julian Service Industries, Inc.;

from 1997- Kelly Cable Corp./Buyers;

from 1999- Rancilio North America, Inc.;

from 2001- Discount Tobacco Distributors

IV. East Building (5013 to 5023 Chase Avenue, Downers Grove, IL)

5013

from 1973- Control Masters, Inc.;

from 1985- Complete Service Electric;

from 1988- International Association of Jim Beam Spec.;

from 1993- Bottcher America Corp.;

from 1996- Interior Specialties Incorporated;

from 1997- United Advertising Publications, Inc.

5015

from 1973- Control Masters, Inc.;
from 1985- Little Friends, Inc.;
from 1988- Laminall Corp.

5017

from 1985- Little Friends, Inc.;
from 1988- Shaun International;
from 1994- C & C Machine Tool
from 1998- Miles Boone Photography;
from 2003- Process Displays, Inc.

5019

from 1974- Bison Gear & Engineering, Inc.;
from 1975- Global Fire Protection Co.;
from 1978- Wittmer & Wolf, Inc.
from 1993- CXP Air Express, Inc.;
from 1994- Shaun International;
from 1996- Newtech Flow Control Prod., Inc.;
from 2000- Lady Ann Fabrics;
from 2004- Drapery Connection

5021

from 1974- Global Fire Protection Co.;
from 1978- Dar Packaging;
from 1981- Wittmer & Wolf, Inc.;
from 1989- American Oerlikon Gear;
from 1992- Chippewa Express, Inc.;
from 1994- Shaun International;
from 2004- Drapery Connection

5023

from 1973- Triple Crown Ind.;
from 1978- R.L. White Co., Inc.;
from 1981- Aztec Energy and Power Transmission, Inc.;

from 1986- Micro Applications, Inc.;
from 1987- Hahn Graphics, Inc.;
from 2002- USA-MEX;
from 2003- Image Sportswear and Souvenirs, Inc.

IV. Southeast Building (5101 to 5111 Chase Avenue, Downers Grove, IL)

5101

from 1974- Sta-Rite Industries, Inc.
from 1980- Western Automotive Warehouse, Inc.;
from 1982- Gingko International;
from 1987- Hugo's Cleaning Service;
from 1988- Serv-All Co.;

5103

from 1974- West Shore Pipe Line Co.;
from 1980- Illinois Toll Highway Authority;
from 1982- Chase-Belmont Properties;

5105

from 1974- Prochem Corp.;
from 1977- MGD Graphics;
from 1980- Engineers Int.;
from 1995- American Computer and Communications, Inc.;
from 2004- Divisor Beverage Distributors

5107

from 1974- MGD Graphics;
from 1980- Data Exchange;
from 1980- Engineers International, Inc.;
from 1983- Gingko International;
from 2002- Ann-Jo, Inc.

5109

from 1974- Davidson-Uphoff, Inc.;
from 1976- MGD Graphics;

from 1980- Hugo's Cleaning Service;
from 1983- Gingko International;
from 1986- Plastic Film Corp. of America;
from 1992- C and C Machine Tool Service, Inc.;
from 1994- Alkut Tools, Inc.;
from 1987- Johnson C & E;
from 1997- J.E. Hailey Co.;
from 1998- BevelCrafters;
from 2004- Shaun International

5111

from 1974- Davidson-Uphoff, Inc.;
from 1976- Western Automotive Warehouse, Inc.;
from 1977- Mako-Tek Corp.;
from 1979- Vinyl Products, Inc.;
from 1983- Holum & Sons Co.;
from 1984- Cellular Floors, Inc.;
from 1990- Johnson C & E;
from 1992- J.E. Hailey Co.;
from 1998- C and C Machine Tool Service, Inc.;
from 1999- Advanced Window Coverings;
from 2001- Sharing Connections, Inc.

2. For each time that you received a shipment of chlorinated solvents at the facility in question, please:

- a. Identify the person or persons responsible for transporting the chlorinated solvents to the facility in question; and
- b. Identify the person or persons who shipped, supplied, sold, or provided the chlorinated solvents to the facility in question.

Answer: CBP has never received a shipment of chlorinated solvents at the facility in question.

3. Please identify all employees responsible for and/or associated with handling chlorinated solvents at the facility in question and/or using chlorinated solvents

at the facility in question, since the time the facility first began operations.

Answer: No employee has been responsible for and/or associated with handling chlorinated solvents at the facility in question and/or using chlorinated solvents at the facility in question, since no such materials were received, handled or used at the facility by CBP.

4. Please identify each person employed by you at any time who has knowledge or information regarding any confirmed or suspected release of chlorinated solvents from the facility in question that may have contaminated any of the surface soil, subsurface soil, surface water, or groundwater at the facility in question, or on any other property.

Answer: No person employed by CBP at any time has knowledge or information regarding any confirmed or suspected release of chlorinated solvents from the facility in question that may have contaminated any of the surface soil, subsurface soil, surface water, or groundwater at the facility in question, or on any other property, other than information received from USEPA in the course of the investigation of the Ellsworth Industrial Park.

5. If, at any time in the past, you or anyone on your behalf have conducted any clean-up and/or remediation of any contamination at the facility in question, or on any property adjacent to or surrounding the facility in question, please identify:

- a. each of your employees who participated in each such clean-up and/or remediation effort; and
- b. the names and addresses of each person, company or organization involved in the clean-up and/or remediation effort.

Answer: CBP has not conducted any clean-up and/or remediation of any contamination at the facility in question, or on any property adjacent to or surrounding the facility in question.

6. If, at any time in the past, you or anyone on your behalf conducted any environmental assessments and/or investigations with respect to contamination from chlorinated solvents at the facility in question, or on any property adjacent to or surrounding the facility in question, please identify:

- a. each of your employees who participated in each such investigation

and assessment ; and

b. the names and addresses of each person, company or organization who has conducted any environmental investigation and/or assessment to date.

Answer: The following investigations were conducted on CBP's behalf:

January 25, 1989, Asbestos & Environmental Inspection, R. J. Mustari & Associates, Inc., 12912 Forest View Road, Palos Heights, IL 60463

- Robert J. Mustari

April 18, 1995, Phase I Environmental Site Assessment, Environmental Design International, Inc., 4415 W. Harrison Street, Suite 530, Hillside, IL 60162

- Julie A. Visser, Environmental Scientist;
- Deborah M. Sawyer, President & CEO

January 2003, Subsurface Soil Investigation, EarthTech, Inc., 408 Brookhaven Circle, Sugar Grove, IL 60554, Phone (630) 466-9967, Fax (630) 466-1087

- Patrick E. Fosnacht, President;
- Kevin Vojtech, Environmental Consultant

July 2, 2003, Phase I Environmental Site Assessment, EarthTech, Inc., 408 Brookhaven Circle, Sugar Grove, IL 60554, Phone (630) 466-9967, Fax (630) 466-1087

- Patrick E. Fosnacht, President;
- Kevin Vojtech, Environmental Consultant

February 24, 2005 Water Discharge Investigation, Integrity Environmental Services, Inc., 1240 Iroquois Drive, Suite 302, Naperville, IL 60563, Phone (630) 718-9133, Fax (630) 718-9114

- Tim B. Morris;
- Mark J. Ravanese

7. Please identify the person(s) that participated in any decision to place

warnings at the facility in question, and/or on containers which you used to store and/or transport chlorinated solvents at the facility in question, regarding the harmful effects of exposure to chlorinated solvents.

Answer: No person associated with CBP has participated in any decision to place warnings at the facility in question, and/or on containers, regarding the harmful effects of exposure to chlorinated solvents, inasmuch as CBP did not use, store or transport said materials.

8. Please identify all of your employees (past and present), contractors or any other persons that have given deposition and/or trial testimony in lawsuits alleging injury, illness and/or property damage as a result of exposure to or contamination from chlorinated solvents, relating to the facility in question, and include the date of such testimony, cause number, style, court, county, state, and the identity of the custodian of such testimony.

Answer: None.

Respectfully submitted,

Tom Yu

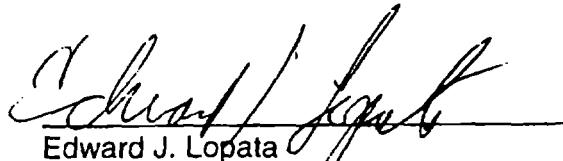
By:

Thomas S. Yu, one of the attorneys
for Chase-Belmont Properties

Michael S. Blazer
Thomas S. Yu
Jeep & Blazer, L.L.C.
1749 S. Naperville Road, Suite 102
Wheaton, IL 60187
(630) 681-2530
fax (630) 690-2812
mblazer@enviroatty.com
tsyu@enviroatty.com

CERTIFICATION

Under penalties as provided by Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that he has read the above and foregoing Chase-Belmont Properties' Answer to First Set of Interrogatories and knows the contents thereof; and that the same are true in substance and in fact; except as to those allegations made on the basis of information and belief, which the undersigned certifies are true to the best of his knowledge, information and belief.



Edward J. Lopata
Chase-Belmont Properties

8-6-5

Date

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REXNORD CORPORATION , et al.,)	Judge J. Darrah
)	
<i>Third-Party Plaintiff,</i>)	Magistrate Judge Levin
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)	
ARROW GEAR COMPANY, et al.,)	
)	
<i>Third-Party Defendants.</i>)	
)	

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused Third Party Defendant, Chase-Belmont Properties' Responses to Interrogatories to be served on the attorneys on the attached service list by U.S. Mail on this 9th day of September, 2005.

Tom Yu

Thomas S. Yu

Thomas S. Yu
Jeep & Blazer, L.L.C.
1749 S. Naperville Road, Suite 102
Wheaton, Illinois 60187
(630) 681-2530
Fax (630) 690-2812
tsyu@enviroatty.com

SERVICE LIST

Defendants/Third-Party Plaintiffs

Pamela R. Hanebutt
Linda P. Kurtos
Eimer, Stahl, Klevorn & Solberg, LLP
224 South Michigan Avenue
Suite 1100, Chicago, IL 60604
Counsel for Lindy Manufacturing Co.

Scott E. Early
Gary S. Rovner
Christopher J. Werner
Foley & Lardner, LLP
321 North Clark Street, Suite 2800
Chicago, IL 60610
Counsel for The Morey Corp.

Mark A. Bilut
Steven P. Handler
Todd R. Wiener
McDermott, Will & Emery
227 West Monroe St
Chicago, IL 60606-5096
Counsel for Rexnord Industries, Inc.

Edward V. Walsh III
Sachnoff & Weaver, Ltd.
30 S. Wacker, 29th Floor
Chicago, IL 60606-6489
Counsel for Scot Incorporated

Alan P. Bielawski
William G. Dickett
John A. Heller
Sidley, Austin, Brown & Wood, LLP
Bank One Plaza
10 South Dearborn Street
Chicago, IL 60603
Counsel for Ames Supply Co.

Elizabeth Harvey
Michael J. Maher
Swanson, Martin & Bell
One IBM Plaza
330 N. Wabash, Suite 3300
Chicago, IL 60611
Counsel for Magnetrol, Inc.

Carol Mahoney Douglas
J. Timothy Eaton
Ungaretti & Harris
Three First National Plaza
70 West Madison Street
Suite 3500
Chicago, IL 60602
Counsel for Tricon Industries

A. Bruce White
Mark D. Erzen
Karaganis, White & Magel, Ltd.
414 North Orleans
Suite 810
Chicago, IL 60610
Counsel for Precision Brand Products, Inc.

Third-Party Defendants

Sheila H. Deely
Sasha M. Engle
Mark Latham

Gardner, Carton & Douglas, LLP
191 North Wacker Drive, Suite 3700
Chicago, IL 60606-1698
Counsel for Downers Grove Sanitary District

Jeremiah P. Connolly
Bollinger, Ruberry & Garvey
500 West Madison Street, Suite 2300
Chicago, IL 60661-2511
Fax: (312) 466-8001
Counsel for Principal Manufacturing Corp.

Joseph A. Strubbe
Vedder, Price, Kaufman & Kammolz, PC
222 North LaSalle Street, Suite 2600
Chicago, IL 60601
Counsel for Bison Gear & Engineering Corp.

Mr. Eric L. Samore
O'Hagan, Smith & Amundsen, LLC
150 N. Michigan Avenue, Suite 3300
Chicago, IL 60601
Counsel for William F. Helwig, Jr.

Brett D. Heinrich
Peter Petrakis
Meckler, Bulger & Tilson LLP
123 North Wacker Drive, Suite 1800
Chicago, IL 60606
Counsel for Fusibond Piping Systems, Inc.

Peter V. Baugher
Jennifer A. Waters
Schopf & Weiss LLP
312 West Randolph Street, Suite 300
Chicago, IL 60606-1721
Counsel for RHI Holdings, Inc. and The Fairchild Corporation

Alan P. Bielawski
William G. Dickett
John A. Heller
Sidley, Austin, Brown & Wood, LLP
Bank One Plaza
10 South Dearborn Street
Chicago, IL 60603
Counsel for White Lake Building Corp.

Laura O'Connell
Nancy J. Rich
Russell B. Selman
Katten Muchin Zavis Rosenman
525 West Monroe Street, Suite 1600
Chicago, IL 60661-3693
Counsel for Lovejoy, Inc.

Carey S. Rosemarin
Law Offices of Carey S. Rosemarin, PC
500 Skokie Blvd., Suite 510
Northbrook, IL 60062
Counsel for Arrow Gear Company